

U.S. DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
SHREVEPORT DIVISION

UNITED STATES OF AMERICA

* 5:21-cr-00130-01 & 02

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VERSUS

* CHIEF JUDGE HICKS

JAMES R. WILLIAMS (01)
ALEXANDER D. PENNINGTON (02)

* MAGISTRATE JUDGE HORNSBY

SUPERSEDING INDICTMENT

THE GRAND JURY CHARGES:

COUNT 1
Conspiracy to Advertise the
Distribution of Child Pornography
18 U.S.C. § 2251(d)(1) & (e)

Beginning on or about May 1, 2021, and continuing through on or about July 7, 2021, in the Western District of Louisiana and elsewhere, the defendants, **James R. Williams** and **Alexander D. Pennington**, and others both known and unknown to the Grand Jury, did knowingly and intentionally conspire, confederate, and agree together and with others, both known and unknown to the Grand Jury, to commit the crime of advertising the receipt, display, and distribution of child pornography.

MANNER AND MEANS OF THE CONSPIRACY

The Defendants were members of multiple private Kik groups dedicated to the advertisement and distribution of child pornography. For purposes of this Superseding Indictment, the term "child pornography" is as defined in Title 18, United States Code, Section 2256(8)(a).

Each private Kik group had rules listed when members entered the group chat. The rules included, but were not limited to, instructing members of the group to “post when joining it’s a private group so no waiting time,” “post in group not in PM so everyone can see/Ask permission to PM someone,” “no rape or force stuff allowed;” and “must say something each day when you are on just posting doesn’t show you are active.” Members of the private Kik chat groups did not use their real names, but instead used screen names to conceal their identities. In order to advertise and distribute the child pornography, members would post in the private Kik chat groups videos and images of child pornography, as well as links to files containing videos and images of child pornography.

At all relevant times, **James R. Williams** and **Alexander D. Pennington** were members of private Kik chat groups dedicated to the advertisement and distribution of child pornography. Additionally, at all relevant times, **James R. Williams** and **Alexander D. Pennington** were members of a private Kik chat group dedicated to the administration of the private Kik chat groups that were dedicated to the advertisement and distribution of child pornography.

VIOLATIONS OF CHILD PORNOGRAPHY STATUTES COMMITTED BY THE DEFENDANTS

The defendants and the members of the private Kik chat groups therein, in concert with two or more persons, engaged in a violation of Title 18, United States Code, Section 2251(d)(1) & (e), that is, conspiracy to advertise the distribution of child pornography. The advertisements included, but are not limited to, the advertisements described more fully below:

1. On or about May 9, 2021, **James R. Williams**, a.k.a. travis_m495, did knowingly publish in the private Kik chat group titled “Group Chat-3” an advertisement offering to distribute a Mega link with the file path titled <https://mega.nz/folder/LZdAhbTS#MZ2r7M9U-Y8RckYpvwRg> along with videos containing child pornography. The Mega link contained videos and images of child pornography.
2. On or about June 1, 2021, **Alexander D. Pennington**, a.k.a. grimka00, did knowingly publish in the private Kik chat group titled “Sneak & Peak,” for the purpose of receiving and displaying child pornography, a notice which stated, “Any babies?”, along with an image of a nude female baby with her vaginal area exposed.

All in violation of Title 18, United States Code, Section 2251(d)(1) & (e).

COUNT 2
Conspiracy to Distribute Child Pornography
18 U.S.C. §§ 2252A(a)(2)(A) & (b)(1)

Beginning on or about May 1, 2021, and continuing through on or about July 7, 2021, in the Western District of Louisiana and elsewhere, the defendants, **James R. Williams** and **Alexander D. Pennington**, and others both known and unknown to the Grand Jury, did knowingly and intentionally conspire, confederate, and agree together and with others, both known and unknown to the Grand Jury, to commit the crime of distribution of child pornography.

MANNER AND MEANS OF THE CONSPIRACY

The United States incorporates the factual allegations presented in Count 1 of the Superseding Indictment as the manner and means of the conspiracy to distribute child pornography.

All in violation of Title 18, United States Code, Sections 2252A(a)(2)(A) & (b)(1).

VIOLATIONS OF CHILD PORNOGRAPHY STATUTES COMMITTED BY THE DEFENDANTS

The defendants and the members of the private Kik chat groups therein, in concert with two or more persons, engaged in a violation of Title 18, United States Code, Sections 2252(a)(2)(A) & (b)(1), that is, conspiracy to distribute child pornography. The child pornography included, but is not limited to, the following:

1. On or about May 9, 2021, **James R. Williams**, a.k.a. travis_m495, did knowingly distribute a Mega link with the file path titled <https://mega.nz/folder/LZdAhbTS#MZ2r7M9U-Y3RckYpvwRg> which contained child pornography.
2. On or about May 13, 2021, **James R. Williams**, a.k.a. travis_m495, did knowingly distribute a video being entitled “IMG_6843,” approximately 1 minute and 51 seconds in length, which contained child pornography.
3. On or about May 13, 2021, **James R. Williams**, a.k.a. travis_m495, did knowingly distribute a video being entitled “IMG_6844,” approximately 1 minute and 51 seconds in length, which contained child pornography.
4. On or about May 20, 2021, **James R. Williams**, a.k.a. travis_m495, did knowingly distribute a video being entitled “IMG_7368,” approximately 15 seconds in length, which contained child pornography.

5. On or about May 22, 2021, **James R. Williams**, a.k.a. travis_m495, did knowingly distribute a video being entitled “IMG_7648,” approximately 14 seconds in length, which contained child pornography.
6. On or about May 24, 2021, **James R. Williams**, a.k.a. travis_m495, did knowingly distribute a video being entitled “IMG_7844,” approximately 1 minute and 1 second in length, which contained child pornography.
7. On or about May 27, 2021, **James R. Williams**, a.k.a. travis_m495, did knowingly distribute a Mega link with the file path titled <https://mega.nz/folder/5yhhDRjl#8JKmFG-KplyEkOb6pp3Xya>, which contained child pornography.
8. On or about June 5, 2021, **Alexander D. Pennington**, a.k.a. grimka00, did knowingly distribute a video approximately 19 seconds in length, which contained child pornography.
9. On or about June 5, 2021, **Alexander D. Pennington**, a.k.a. grimka00, did knowingly distribute a video approximately 1 minute and 59 seconds in length, which contained child pornography.
10. On or about June 10, 2021, **Alexander D. Pennington**, a.k.a. grimka00, did knowingly distribute an image of child pornography.
11. On or about June 11, 2021, **Alexander D. Pennington**, a.k.a. grimka00, did knowingly distribute a video approximately 33 seconds in length, which contained child pornography.

12. On or about June 11, 2021, **Alexander D. Pennington**, a.k.a. grimka00, did knowingly distribute a video approximately 1 minute and 6 seconds in length, which contained child pornography.

All in violation of Title 18, United States Code, Section 2251(d)(1).

COUNTS 3 - 9
Distribution of Child Pornography
18 U.S.C. § 2252A(a)(2)

On or about the dates below, in the Western District of Louisiana and elsewhere, the defendant, **James R. Williams**, a.k.a. travis_m495, did knowingly distribute child pornography as described below, which is defined in Title 18, United States Code, Section 2256, using a facility of interstate commerce, to wit:

COUNT	DATE	DESCRIPTION
3	May 9, 2021	a Mega link with the file path titled https://mega.nz/folder/LZdAhbTS#MZ2r7M9U-Y3RckYpwwRg
4	May 13, 2021	a video being entitled "IMG_6843," which was approximately 1 minutes and 51 seconds in length
5	May 13, 2021	a video being entitled "IMG_6844," which was approximately 1 minutes and 51 seconds in length
6	May 20, 2021	a video being entitled "IMG_7368," which was approximately 15 seconds in length
7	May 22, 2021	a video being entitled "IMG_7648," which was approximately 14 seconds in length
8	May 24, 2021	a video being entitled "IMG_7844," which was approximately 1 minute and 1 second in length
9	May 27, 2021	a Mega link with the file path titled https://mega.nz/folder/5yhhDRjl#8JKmFG-KplyEkOb6pp3Xya

FORFEITURE NOTICE

1. The allegations in Counts 1 through 9 of this Superseding Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 2253.

2. Pursuant to Title 18, United States Code, Section 2253, upon conviction of an offense in violation of Title 18, United States Code, Section 2252A(a)(2), the defendant, **James R. Williams**, shall forfeit to the United States of America:

- a. Any visual depiction described in Title 18, United States Code, Sections 2252A(a)(2)(A) or any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped, or received in violation of Title 18, United States Code, Chapter 110; and
- b. Any property, real or personal, used or intended to be used, to commit or to promote the commission of the offenses.

3. The property to be forfeited by **James R. Williams** includes:

- a. Three (3) Polaroid Blue Fun Shooter Roll Cameras
- b. White Samsung Galaxy Note 3/4GLTE; Model: SM-N900VUD; IMEI: 990004354731378
- c. Black Motorola cellular phone; MODEL: E6; IMEI: 352176100671991
- d. Black Motorola cellular phone; MODEL: XT1609; IMEI: 354142072313770
- e. Black Samsung MODEL: SCH-1200; IMEI: 990002130962911
- f. Black Motorola Verizon cellular phone, MODEL: 4GLTE
- g. Black Samsung MODEL: SCH1510; IMEI: 990000242514000
- h. Black Moto cellular phone MODEL: XT1767; IMEI: 353308088682828
- i. Black TracFone; MODEL: A462C; FCC ID: 2ACCJB013
- j. Black LG cellular phone; MODEL: LS665; S/N: 509KPKN0781701
- k. Black SanDisk 32GB Micro SD HC
- l. White TracFone SIM-TF256PSIMV9DD 8914800000 1978546843
- m. Dell computer CPU
- n. USB flash drive PNY 8GB

- o. Silver HP laptop; S/N: 5CG0196MN4; MODEL: 14-DK1022WM
- p. Black RCA tablet; MODEL: RCT6973W43

4. Pursuant to Title 18, United States Code, Section 2253, upon conviction of an offense in violation of Title 18, United States Code, Section 2252A(a)(2), the defendant, **Alexander D. Pennington**, shall forfeit to the United States of America:

- a. Any visual depiction described in Title 18, United States Code, Sections 2552A(a)(2)(A) or any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped, or received in violation of Title 18, United States Code, Chapter 110; and
- b. Any property, real or personal, used or intended to be used, to commit or to promote the commission of the offenses.

5. The property to be forfeited by **Alexander D. Pennington** includes:

- a. Apple iPad; S/N H9GF600NQ1KY;
- b. iPhone 12 Pro Max; S/N G0NPPE690D37; and
- c. Dell Latitude E5540 Desktop Computer; S/N 9YDTD12

A TRUE BILL

REDACTED

GRAND JURY FOREPERSON

ALEXANDER C. VAN HOOK
Acting United States Attorney

FOR
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